

MARK B. HANSON, ESQ.
Second Floor, Macaranas Building
Beach Road, Garapan
PMB 738 P.O. Box 10,000
Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
Facsimile: (670) 233-5262
E-mail: markbhanson@gmail.com

Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,)

vs.)

JUNG JIN CORPORATION, a CNMI corporation,)
ASIA ENTERPRISES, INC., a CNMI corporation,)
PARK HWA SUN, KIM HANG KWON,)
KSK CORPORATION, a CNMI corporation, and)
KIM KI SUNG,)

Defendants.)

MOTION FOR SUMMARY
JUDGMENT AGAINST KSK
CORPORATION AND KIM KI SUNG

Date: Thursday, July 17, 2008

Time: 8:30 a.m.

Judge: Hon. Alex R. Munson, Chief Judge

COMES NOW the Plaintiffs, by and through their attorney, with a motion pursuant to Fed. R. Civ. P. 56 for summary judgment against Defendants KSK CORPORATION and KIM KI SUNG for the claims of successor liability and fraudulent conveyance contained in Plaintiffs' Second Amended Verified Complaint filed in this matter on October 12, 2007.

This motion is supported by the pleadings, deposition, discovery and other records in this matter, by the declarations submitted herewith, by the Memorandum in Support thereof, and by the Proposed Findings of Uncontroverted Fact submitted concurrently herewith.

For the reasons stated below, Plaintiffs respectfully request that the Court find that there are

1 no genuine issues of material fact for trial and grant Plaintiffs judgment against KSK and KIM
2 holding them jointly and severally liable for the unsatisfied portion of the August 24, 2006 Judgment
3 against the four other defendants in this action, in addition to statutory attorney's fees and costs.

4 Alternatively, Plaintiffs request that the Court find the conveyance of the assets between the
5 defendants fraudulent and in hindrance of Plaintiffs' redress for their wage and contract claims
6 against four of the defendants hereto. Plaintiffs respectfully request that the Court void the
7 fraudulent conveyances and return the transferred property into the hands of the original defendants
8 to this action and back within the reach of Plaintiffs for satisfaction of a portion of the Judgment
9 against the four original defendants hereto.

10
11 Respectfully submitted this 19th day of June, 2008.

12
13 /s/ Mark B. Hanson

14
15

MARK B. HANSON

16 Second Floor, Macaranas Building
17 Beach Road, Garapan
18 PMB 738, P.O. Box 10,000
19 Saipan, MP 96950
20 Telephone: (670) 233-8600
21 Facsimile: (670) 233-5262
22 E-mail: markbhanson@gmail.com

23
24 Attorney for Plaintiffs
25
26
27

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be deposited in the United States Post Office,
first class mail, postage prepaid, addressed to the following:

Jung Jin Corporation
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Park Hwa Sun
P.O. Box 503428
Saipan, MP 96950
(670) 235-4321

Asia Enterprises Inc.
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

Kim Hang Kwon
P.O. Box 503448
Saipan, MP 96950
(670) 235-4321

I further certify that the following were served with a copy of the foregoing via the Court's
electronic case filing system and via e-mail:

G. Anthony Long, Esq.
LAW OFFICE OF G. ANTHONY LONG
P.O. Box 504970
Saipan, Mariana Islands 96950
E-mail: gal@nmilaw.com

DATED: June 19, 2008

/s/ Mark B. Hanson

MARK B. HANSON